

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE
(USPS/OCA-1-2)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate: USPS/OCA-T-1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

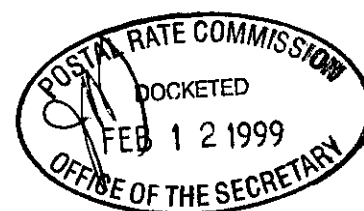
By its attorneys:

Daniel J. Foucheaux, Jr.
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February 12, 1999



INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE
TO THE OFFICE OF THE CONSUMER ADVOCATE

USPS/OCA-1

On page 9 of the Office of the Consumer Advocate Response to Issue No. 5 of Notice of Inquiry No. 1, filed February 8, 1998, the OCA states that "[o]nly those services that are facilitated or purchased at the POL website benefit from the marketing of POL."

- (a) Please confirm that the POL website can be used to purchase First-Class Mail and Standard Mail (A), through Mailing Online.
- (b) Please confirm that Shipping Online provides a means to purchase Express Mail and Priority Mail.
- (c) Does the OCA agree that Postal Service advertising for POL may be in part driven by goals of facilitating the usage of First-Class Mail, Express Mail, Priority Mail, and Standard Mail (A)? If not, please explain.
- (d) Assuming that Postal Service advertising for POL is in part driven by goals of increasing volumes of First-Class Mail, Express Mail, Priority Mail, and Standard Mail (A), should these classes and subclasses of mail bear some responsibility for the costs of this advertising? Please explain your answer completely.

USPS/OCA-2


On page 10 of the Office of the Consumer Advocate Response to Issue No. 5 of Notice of Inquiry No. 1, filed February 8, 1998, the OCA "proposes that the relative

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usage of POL for access to the various services available at the site is the logical distribution key [for advertising costs]." Consider a hypothetical in which POL provides only two services, Shipping Online (SOL) and Mailing Online (MOL). Please assume that over a given time period there are 60 MOL transactions and 40 SOL transactions. Please further assume that over that same period, advertising costs for POL total \$100. Please confirm that the OCA's distribution approach would distribute \$60 of advertising costs to MOL and \$40 to SOL. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin

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